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**THERESA LEBRON-CORREA**

Plaintiff,

v.

**ALLEGIANCE HEALTHCARE CORP.**

Defendants.

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**SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION - MIDDLESEX COUNTY  
DOCKET NO. L-0066-01 MT**

**CIVIL ACTION  
LATEX LITIGATION**

**SCHEDULING  
RECOMMENDATION**

**THIS MATTER** having been conferenced before Special Master Joyce Usiskin on Tuesday, September 25, 2001 all counsel listed on "Exhibit A" appearing and good cause having been shown;

**IT IS** on this \_\_\_\_\_ day of **September** 2001

**RECOMMENDED** that:

1. Plaintiff shall forward a complete list of all of her treating and consulting physicians, dentists and any medical specialists she has consulted to lead defense counsel Glenn Kerner, Esq., no later than Wednesday, October 24, 2001. The list shall include the names, addresses and telephone numbers for each medical or dental provider.

2. Plaintiff shall complete all product identification inquiries of plaintiff's present and past employers by Friday, November 9, 2001. If no suppliers or manufacturers are identified by November 9<sup>th</sup>, any defendant may move for summary judgment dismissing the suit as to all defendants.

3. Plaintiff shall notify Special Master Usiskin as soon as product identification discovery is complete and in any event, no later than November 9, 2001. If any manufacturer or distributor has been identified, plaintiff shall file a voluntary dismissal as to the remaining defendants and arrange with the special master for a settlement conference with those identified named defendants.

4. Merits Interrogatories are to be completed and served by January 7, 2002.

5. Plaintiff's deposition shall be scheduled for some date prior to January 30, 2002.

6. A joint defense motion to dismiss the complaint as time barred shall be filed for a return date on the last motion day in March 2002. Additional discovery, limited to authorizations for medical records, disclosure of witnesses at a Lopez hearing, depositions of such witnesses shall be permitted prior to and after the filing of the motion addressed to the Statute of Limitations defense.

7. If necessary, a further case management conference shall be scheduled after the disposition of the motion for dismissal.

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JOYCE USISKIN, SPECIAL MASTER